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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Rosa Isela Rivera,)	Case No. 1:23-cv-00900-BAM
Plaintiff,)	STIPULATION AND PROPOSED
vs.)	ORDER FOR EXTENSION OF
Kilolo Kijakazi, Acting)	TIME
Commissioner of Social Security,)	
Defendant.)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 14-day extension of time, from December 13, 2023 to December 27, 2023, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's third request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs

1 being due on the same week. For the weeks of December 11, 2023 and December
2 18, 2023, Counsel has six merit briefs and one reply brief due, as well as several
3 EAJA petitions to draft. Counsel requires additional time to brief the issues
4 thoroughly for the Court's consideration. Defendant does not oppose the requested
5 extension. Counsel apologizes to the Defendant and Court for any inconvenience
6 this may cause.

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8 Respectfully submitted,

9 Dated: December 13, 2023 PENA & BROMBERG, ATTORNEYS AT LAW
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11 By: /s/ Dolly M. Trompeter
12 DOLLY M. TROMPETER
13 Attorneys for Plaintiff
14

15 Dated: December 13, 2023 PHILLIP A. TALBERT
16 United States Attorney
17 MATTHEW W. PILE
18 Associate General Counsel
19 Office of Program Litigation, Office 7
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21 By: */s/ Justin Lane Martin
22 Justin Lane Martin
23 Special Assistant United States Attorney
24 Attorneys for Defendant
25 (*As authorized by email on December 13, 2023)
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ORDER

Pursuant to stipulation and good cause appearing, on or before **December 27, 2023**, Plaintiff shall file and serve on Defendant Plaintiff's Motion for Summary Judgment.

IT IS SO ORDERED.

Dated: **December 14, 2023**

/s/ *Barbara A. McAuliffe*
UNITED STATES MAGISTRATE JUDGE